

THE LAW OFFICES OF
RICHARD MALAGIERE
A PROFESSIONAL CORPORATION
www.malagierelaw.com

Richard Malagiere
Member NJ & NY Bar
Registered Patent Attorney

250 MOONACHIE ROAD
3rd FLOOR
MOONACHIE, NJ 07074
201.440.0675
FAX: 201.440.1843

100 CHURCH STREET
SUITE 800
NEW YORK, NEW YORK 10007
212.879.5580
FAX: 212.879.5583

Giancarlo Ghione
Member NJ Bar
Michael Kahn
Registered Patent Agent
Leonard E. Seaman
Certified Civil Trial Attorney

***REPLY TO NJ OFFICE**

Writer's Direct Dial: 201.509.4180
Writer's e-mail: les@malagierelaw.com

May 14, 2024

VIA CM/ECF

The Honorable José R. Almonte, U.S.M.J
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
Court Room PO 9
50 Walnut Street
Newark, New Jersey 07101

Re: LORENZO v. THE BOROUGH OF PALISADES PARK, NEW JERSEY et al.
Civil Action No.: 2:23-cv-21849-CCC-JRA

Dear Judge Almonte:

This office represents plaintiff, David Lorenzo, in the above matter.

Pursuant to the Court's April 16, 2024 text order, we filed plaintiff's first amended complaint (ECF No. 18) and served it on the two new defendants, Jae Park and Stephanie S. Jang on May 1st and 2nd (ECF Nos. 22 and 23).

Roshan Shah, Esq. has advised that he will be appearing on behalf of defendants, Jang and Park.

Scott Fahrney, Esq. will continue as counsel for the defendants named in plaintiff's original complaint—the Borough of Palisades Park, Mayor Kim, and Councilman Suk.

Both Mr. Shah and Mr. Fahrney expect to file motions to dismiss the first amended complaint under *Fed.R.Civ.P.* 12(b)(6).

To that end, all counsel conferred and agreed to the following briefing schedule subject to the Court's approval:

All defendants will file motions to dismiss no later than June 7, 2024.

Plaintiff will file opposition to the motions no later than July 1, 2024.

Defendants will file reply briefs no later than July 8, 2024.

This would allow the Court to set July 14, 2024 as the return date of these applications.

If this schedule is acceptable to the Court, we respectfully request that an appropriate scheduling order be entered. If Your Honor would like to address any aspect of this request, we would be happy to set up a phone or video conference to do so.

Respectfully,

s/ Leonard E. Seaman
LEONARD E. SEAMAN

LES/me

cc: R. Scott Fahrney , Jr., Esq. (via CM/ECF)
Roshan Shah, Esq. (via email (RShah@andersonshahlaw.com>)
client (via e-mail)